

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHARON LEE,

Plaintiff,

v.

TRUIST BANK, SUNTRUST BANK, INC.,
GENSPRING FAMILY OFFICES, LLC,
ROBERT WEISS, in his individual and
professional capacities, and THOMAS
CARROLL, in his individual and professional
capacities,

Defendants.

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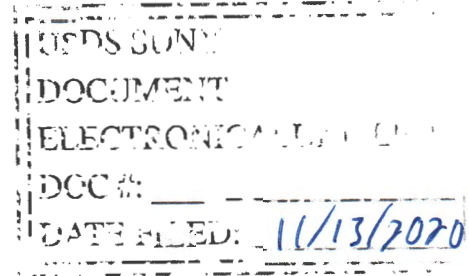
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Civil Action No. 20 Civ. 1816 (JGK)

**(PROPOSED) AMENDED JOINT
DISCOVERY PLAN**

Pursuant to Your Honor's May 13, 2020 order (Dkt. No. 19) and Federal Rule of Civil Procedure 26(f), Plaintiff Sharon Lee ("Plaintiff") and Defendants Truist Bank, Suntrust Bank, Inc., GenSpring Family Offices, LLC, Robert Weiss and Thomas Carroll (together, "Defendants") hereby submit, through their undersigned counsel, this proposed amended joint discovery plan.


1. Service of Initial Discovery Protocols for Employment Cases Alleging Adverse Action: July 24, 2020
2. Service of initial document requests and interrogatories: July 24, 2020
3. Service of Proposed Protocol for the Search of Electronically Stored Information ("ESI Protocol"): July 24, 2020
4. Completion of fact discovery: January~~November~~ 26~~5~~, 2020
5. Rule 26(a)(2) Expert Disclosures and Affirmative Expert Reports: ~~December 9, 2021~~ ~~12/9/20~~ February 9, 2021
6. Rebuttal Expert Disclosures and Expert Reports: ~~December 23, 2020~~ ~~+~~ February 22, 2021
7. Completion of Expert Discovery: ~~January 25, 2021~~ ~~+~~ March 26, 2021

8. Submission of pre-motion conference letter regarding motion for summary judgment: ~~February 1, 2021~~ April 2, 2020 (if there is expert discovery). If no expert discovery, then within 21 days of the end of fact discovery.

Dated: ~~November 13, 2020~~ ~~November 12, 2020~~ ~~November 12, 2020~~ ~~November 12, 2020~~ ~~October 30, 2020~~

New York, New York

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Counsel for Defendants

SO ORDERED.


John G. Koeltl, United States District Judge

11/13/20